

Submitted to techforum@bpa.gov on October 29, 2026

RE: PPC Comments on BPA's RAPID and Transmission Open Season Concepts

The Public Power Council (PPC)¹ appreciates the opportunity to provide feedback on BPA's most recent Grid Access Transformation (GAT) workshop focusing on Rapid Access Products & Interconnection Delivery (RAPID) and Transmission Open Season (TOS) concepts. We acknowledge these comments are later than requested by BPA, but additional time was needed to discuss these concepts with PPC members, particularly considering a very busy BPA workshop calendar within the week allotted for response.

General Reflections on the October 19 Workshop

As consumer owned utilities, PPC members are responsible for serving the electricity needs of their local communities. A large part of this role is facilitating economic development in those communities through providing affordable, reliable, and timely electricity service. BPA plays a large role in PPC members' ability to facilitate this economic development, which can provide a meaningful difference in the economic health and growth opportunities in communities across the Northwest.

PPC members have diverse needs and work with their customers to meet the specific needs of their communities. For some members, this will include serving data centers, for others it will include more focus on manufacturing, food processing, or other loads that present different economic opportunities. It will be important that BPA continue to adopt policies that help ensure that all these diverse needs can be met. A future where specific, limited uses of the system are advanced to the detriment of other loads in the region could harm the economic prospects for some of the Northwest communities served by PPC members.

With this in mind, PPC supports proposals that can achieve all of the following outcomes:

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

- Allows the use of otherwise unused transmission capacity on BPA's existing system.
- Does not negatively impact the quality of existing firm (NERC Code Priority 7), secondary non-firm and conditional firm (NERC Code Priority 6) service.
- Does not shift costs of integrating new large loads to other Network customers.
- Does not prevent current transmission and interconnection requests that are actively pursuing service through BPA's existing processes from receiving firm service.
- Does not disadvantage loads that do not qualify as "large loads."
- Does not disadvantage future planned and/or unplanned network load growth.

We appreciate that BPA has thoughtfully considered some of these issues and was able to address how it would achieve some of these objectives. Overall, more discussion is needed to ensure that these objectives can be met.

Timing Considerations and Opportunities to Vet Proposals

We appreciate that BPA has heard the call to move quickly to increase access to the transmission system; however, the effort to move quickly must be balanced with giving customers and BPA enough time to work together to understand proposals and identify potential impacts. One day of additional workshop discussion prior to initiating formal processes to adopt these proposals is likely insufficient to provide enough time for that vetting to occur. This is particularly true for TOS, which seemed significantly less developed than the RAPID products.

Additionally, it is difficult to evaluate this proposal without better understanding the next steps in TC-27. Potential sales made through the process included in the TC-27 settlement could influence the collective impacts on the quality of conditional firm service or availability of short-term non-firm service.

Potential Impacts on Traditional Load Growth in the Region

PPC is concerned about the potential for over-subscribing the system to the detriment of traditional load growth. PPC requests that BPA demonstrate how it will ensure that these proposals will not expose traditional load growth (served by both NT and PTP) to additional costs through allocating remaining current and potential new capacity that could have served other uses. What tools will BPA use (including potentially recalling SPRINT and PLAID offers) to ensure this does not occur?

We look forward to hearing more details from BPA about these proposals, as well as an evaluation of whether the agency feels it is prepared to pursue these proposals on the timeline proposed given customer feedback.

Prioritization of RAPID Within the Context of a Constrained System

Critical to evaluating the potential impacts of RAPID is understanding how prioritizing these new offerings will impact the agency's work on other transmission issues. PPC would like to better understand what work will be deprioritized to allow BPA staff to redirect their attention to RAPID. For PPC members who need transmission and have continued moving forward through all current available processes, the potential to slow those processes down in order to facilitate RAPID offerings is concerning – particularly given the potential uncertainty that entities will be interested in RAPID products. We would appreciate BPA addressing this critical issue on workload constraints at its next workshop.

Speed to Power Request for Interim Non-Firm Transmission (SPRINT)

PPC appreciates that BPA has reviewed approaches taken by other transmission providers in developing its proposal. We look forward to additional implementation details at the next workshop. For instance, BPA will need to clearly demonstrate that it can disconnect load if required. Such demonstration is necessary to ensure that impacts to existing uses of the system will be minimal, and that BPA will be able to maintain reliability, despite offering a significant amount of new transmission service under SPRINT.

The structure of agreements (whether those agreements are directly with the load or between BPA, the utility, and the load) is important and needs to be settled before the tariff process. How the agency will work with the utility to make sure it has visibility into any operating directives provided to the load by BPA also needs to be addressed.

PPC is also looking for more specifics on how BPA will evaluate “proposals” as it is considering potential recipients of SPRINT service. We would like to understand whether there will be any discussion with customers (either customers at large or with the utilities where load resides) during or after the decision making process.

Paired Load and Integrated Dispatch (PLAID)

PPC appreciates the concept behind facilitating access for load that is co-located with generation and therefore will have limited impacts on BPA's transmission system. To understand the potential impacts of this proposal, BPA will need to better define what “co-located” means and develop a clear definition that can be consistently applied across the system.

For potential PLAID offers, it is reasonable to apply readiness criteria to ensure that those ready to take service are receiving service. To help us evaluate the potential impacts (both benefits and risks) resulting from PLAID offers, it would be helpful to understand how many requests BPA currently has in its queue that would qualify for PLAID. This can also help inform our assessment of the proposal to conduct a recurring process to examine five potential offers each quarter.

Other Outstanding Questions on RAPID

Within the context of the RAPID offerings, PPC has additional questions that BPA should strive to address at its next workshop:

- What is the impact on 6 NN of additional sales?
- Given the anticipated impact to short term service, what if any relief can BPA provide to entities currently using short term transmission as they move through BPA's processes for receiving long term service?
- Why is SPRINT limited to data center load instead of all large load?
- What happens to loads that are less than 50 MW but require interconnection upgrades to receive service?
- What happens to NT loads between 13 and 50 MW for load service?
- Why is BPA sequencing offers in this way? It seems that PLAID would have less impact on the transmission system. Should it not be considered first?
- What is the 5 GW target of integrated data center load based on? Would BPA cap total offers under RAPID to the 5 GW referenced in its goals?
- What tools is BPA going to use to cut SPRINT and PLAID use of the system if necessary?
- What does a "commitment" to a path to firm look like? Is BPA considering additional financial deposits or other deterrents to keep entities from walking away?

Tariff and Rate Changes

At the October 19 workshop BPA explained that, consistent with the Rate Payer Protection Pledge, the agency would be assigning any costs of serving new data center load to the data centers. PPC appreciates the intention that growth pay for growth on the system. The agency explained that one approach to implement this objective would be a revision of its direct assignment policies. Additional information on new direct assign guidelines would help us analyze BPA's proposal.

Transmission Open Season (TOS)

The proposed TOS is a foundational change to how BPA offers transmission service, and it is disappointing that there was not more time to discuss this concept at the last workshop – particularly given there is currently only one more opportunity scheduled before formal proceedings and *ex parte*.

Based on the information presented, it is unclear at this time if TOS provides an equitable path forward for all uses of the system. As stated above, it is vital to ensure that PPC members can access transmission to help growth in their communities – manufacturing, food processing, other commercial development – that may not be eligible for RAPID products. Allowing up to 5 GW of demand using RAPID products to receive priority for rights to long term service after the construction of new High Opportunity Transmission (HOT) projects could detrimentally impact PPC members with needs that BPA would otherwise be planning for under current processes, or where requests for service have been submitted. We would like to work with the agency to better understand the likelihood that such an outcome could occur.

At the November workshop, examples walking through how the TOS process applies to different types of requests would be helpful. For example: traditional load growth, load growth between 13MW and 50 MW, load above 50 MW with RAPID products, load above 50 MW receiving service through BP-27 CF, load above 50 MW not yet receiving any products. Including some examples of how “bids” will be evaluated would also be informative.

There was not much time at the last workshop to discuss the use of “windows” for processing requests. More details are needed including how BPA will evaluate submissions received within the same window and whether those requests would need to compete with requests received in future windows to ensure they are still providing BPA the highest value. We note that today the OATT provides for competition and so there is some precedent at least at a conceptual level for such considerations.

In addition to the areas described above where more information is needed, PPC requests that BPA address other outstanding questions on the TOS process:

- How, if at all, is BPA going to consider value outside of revenue to BPA in determining its allocation of capacity?
- What happens to requests that are currently in the queue? How is this impacted by whether TC-27 moves forward?
- What happens with NT requests between 13 and 50 MW?

- Do PLAID and SPRINT entities have to be recompeteted when they get to TOS? What if there are bids in the TOS that provide greater value than the PLAID and SPRINT projects?

Conclusion

PPC thanks BPA for having urgency and creativity in its approach to this issue. We hope additional discussions can demonstrate whether this approach will benefit BPA customers and that the agency will consider whether additional time and dialogue is needed to avoid unintended consequences. Some aspects of the proposals presented by BPA on October 19 are more developed than others and the agency should consider this in determining the scope for TC-27R and BP-27R.

We look forward to continued engagement at the November workshop.

Sincerely,

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